

PHILIP DOYLE  
Trial Attorney, Tax Division  
U.S. Department of Justice  
P.O. Box 310  
Ben Franklin Station  
Washington, D.C. 20044-0683  
Telephone: (202) 514-9673

BLAINE T. WELSH  
HOLLY VANCE  
Assistant United States Attorneys  
District of Nevada  
100 W. Liberty Street  
Reno, Nevada 89501  
(775) 784-5438

**IN THE UNITED STATES DISTRICT COURT FOR THE  
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,	)	
	)	Case No. 3:16-cv-00142-MMD-VPC
Plaintiff,	)	
	)	<b>PLAINTIFF UNITED STATES OF</b>
v.	)	<b>AMERICA'S UNOPPOSED MOTION</b>
	)	<b>TO STAY ACTION</b>
KENNETH J. MCKENNA, BANK OF	)	
NEW YORK MELLON TRUST	)	
COMPANY, N.A., etc., and WASHOE	)	
COUNTY TREASURER,	)	
	)	
Defendants.	)	
_____	)	

The United States of America moves the Court to stay this action in its entirety – both the Government's claim and the counterclaim/cross-claim filed by Bank of New York Mellon Trust – because the United States and the taxpayer, Kenneth McKenna have entered into a settlement of their dispute. The relevant terms of the settlement require McKenna to pay the United States a sum certain within 90 days and, if he does that, the United States will dismiss this action WITHOUT PREJUDICE. In the event McKenna does not make the required payment, the United States will promptly file a motion for summary judgment.

Counsel for the United States has conferred with all other counsel in the case, and this motion is unopposed.

WHEREFORE, the United States moves the Court to stay this action for 90 days.

Date: August 2, 2016

CAROLINE D. CIRAOLLO  
Assistant Attorney General

/s/ Philip Doyle  
PHILIP DOYLE  
Trial Attorney, Tax Division  
U.S. Department of Justice  
P.O. Box 301  
Ben Franklin Station  
Washington, D.C. 20044-0683  
Telephone: (202) 514-9673  
Email: Philip.a.doyle@usdoj.gov

Of Counsel:  
BLAINE T. WELSH  
HOLLY VANCE  
Assistant United States Attorneys

Attorneys for the United States of America

CERTIFICATE OF SERVICE

It is hereby certified that service of the foregoing Plaintiff United States of America's Unopposed Motion to Stay Action has been made on August 2, 2016, to the following:

- By ECF notification:

Jacob D. Bundick  
Whitney Welch  
Greenberg Traurig, LLP  
3773 Howard Hughes Parkway  
Suite 400  
Las Vegas, NV 89169  
*Attorney for Bank of New York Mellon Trust*

1 Michael Large  
2 Washoe County District Attorney  
3 P.O. Box 11130  
4 Reno, NV 89520  
5 *Attorney for Washoe County Treasurer*


- By First Class U.S. mail:

6 Kenneth McKenna, Esq.  
7 544 West First Street  
8 Reno, Nevada 89503

9 /s/ Philip Doyle  
10 PHILIP DOYLE  
11 Trial Attorney

12 IT IS SO ORDERED.

13 Dated: August 2, 2016

14   
15 U.S. District Judge